

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

ALFRED LEE MASSIE JR.

§
§
§
§
§

No. 4:21-CR-

Judge

125

Jordan

INDICTMENT

The United States Grand Jury charges:

Count One

Violation: 18 U.S.C. §§ 371, 922(u) & 2
(Conspiracy to Steal Firearms from a Federally
Licensed Firearms Dealer; Aiding and Abetting)

FILED

MAY 12 2021

Clerk, U.S. District Court
Texas Eastern

Beginning on or about April 10, 2021, the exact date being unknown to the Grand Jury, through and including the date of the filing of this indictment, in the Eastern District of Texas, and elsewhere, the defendant, ALFRED LEE MASSIE JR., did knowingly and willfully combine, conspire and agree with other persons known and unknown to the United States Grand Jury to knowingly steal, unlawfully take, and carry away firearms from the premises of a federally licensed firearms dealer, all of which had been previously shipped and transported in interstate commerce, in violation of 18 U.S.C. §§ 922(u) and 924(i)(1).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that the defendant, along with other persons known

and unknown to the Grand Jury, would and did:

1. Recruit members to the conspiracy;
2. Identify a victim federally licensed firearms dealer which possessed firearms at its place of business;
3. Obtain entry into the premises of the federally licensed firearms dealer without permission;
4. Steal and remove a number of firearms from the business inventory of the federally licensed firearms dealer; and
5. Possess, conceal, store, barter, sell and dispose of the stolen firearms to actors known and unknown to the Grand Jury.

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendant, along with other persons known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Texas:

6. On or about April 19, 2021, the defendant and coconspirators drove the defendant's black Chevy Impala to SK Arms, a federally licensed firearms dealer (FFL) located in Flower Mound, Denton County, Texas;
7. Thereafter, upon arrival, the defendant and coconspirators made unlawful entry into SK Arms by backing the defendant's Impala into and through the glass entryway;
8. Once inside, the defendant and coconspirators moved throughout the store,

smashing display cases and retrieving firearms and firearms accessories; and

9. The defendant and coconspirators unlawfully stole, took and carried away the following firearms which were in the business inventory of SK Arms:

- a. KEL-TEC, PMR-30, .22 caliber pistol, bearing serial number: WY0F40
- b. TAURUS, GC3, 9mm pistol, bearing serial number: ACC653444
- c. BERETTA, 92A1, 9mm pistol, bearing serial number: BIN017371
- d. SMITH&WESSON, PC M&P SF, 9mm pistol, bearing serial number: JFS5435
- e. GLOCK, G48 MOS, 9mm pistol, bearing serial number: BSNW335
- f. GLOCK, G45, 9mm, bearing serial number: BTHA785
- g. GLOCK, G44, 9mm pistol, bearing serial number: AFFV423
- h. CZ, SHADOW 2, 9mm pistol, bearing serial number: F000309
- i. HK, VP9L OR, 9mm pistol, bearing serial number: 238-009769
- j. HK, P30S, 9mm pistol, bearing serial number: 129-095857
- k. HK, VP9 Green, 9mm pistol, bearing serial number: 224-318173
- l. HK, VP9 FDE, 9mm pistol, bearing serial number: 224-313606
- m. HK, HK45-V1, .45 caliber pistol, bearing serial number: HKU-054116
- n. ZEV TECHNOLOGIES, AR15-CE-30, .300 caliber AR pistol, bearing serial number: ZFL05003
- o. EWS, E-15, .300 caliber AR pistol, bearing serial number: E15-00059

All in violation of 18 U.S.C. § 371 and 18 U.S.C. §§ 922(u) and 924(i)(1).

Count Two

Violation: 18 U.S.C. §§ 371, 922(j) & 2
(Conspiracy to Receive, Possess, Conceal and
Dispose of Stolen Firearms; Aiding and
Abetting)

Beginning on or about April 10, 2021, the exact date being unknown to the Grand Jury, through and including the date of the filing of this indictment, in the Eastern District of Texas, and elsewhere, the defendant, ALFRED LEE MASSIE JR., did knowingly and willfully combine, conspire and agree with other persons known and unknown to the

United States Grand Jury to knowingly receive, possess, conceal, store, barter, sell, and dispose of stolen firearms, all of which had been previously shipped and transported in interstate commerce, in violation of 18 U.S.C. §§ 922(j) and 924(a)(2).

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that the defendant, along with other persons known and unknown to the Grand Jury, would and did:

1. The manner and means of the conspiracy are described in paragraphs 1 - 5 of Count One, which are incorporated herein.

OVERT ACTS

In furtherance of the conspiracy and to affect the objects thereof, the defendant, along with other persons known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Texas:

2. The overt acts are described in paragraphs 6 - 9 of Count One, which are incorporated herein.

All in violation of 18 U.S.C. § 371 and 18 U.S.C. §§ 922(j) and 924(a)(2).

Count Three

Violation: 18 U.S.C. §§ 922(j) & 2
(Possession of a Stolen Firearm or
ammunition; Aiding and Abetting)

On or about April 19, 2021, in the Eastern District of Texas, the defendant, ALFRED LEE MASSIE JR., aided and abetted by others both known and unknown to the Grand Jury, knowingly received, possessed, concealed and stored stolen firearms, all

of which had been previously shipped and transported in interstate commerce, while knowing and having reasonable cause to believe the firearms were stolen, in violation of 18 U.S.C. §§ 922(j) & 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Criminal Forfeiture Pursuant to 18 U.S.C. § 924(d)

As a result of committing the felony offense in violation of 18 U.S.C. §§ 922(u) and (j) alleged in this Indictment, defendant, ALFRED LEE MASSIE JR., shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d), all firearms and ammunition involved in the offense, including but not limited to the following:

1. KEL-TEC, PMR-30, .22 caliber pistol, bearing serial number: WY0F40
2. TAURUS, GC3, 9mm pistol, bearing serial number: ACC653444
3. BERETTA, 92A1, 9mm pistol, bearing serial number: BIN017371
4. SMITH&WESSON, PC M&P SF, 9mm pistol, bearing serial number: JFS5435
5. GLOCK, G48 MOS, 9mm pistol, bearing serial number: BSNW335
6. GLOCK, G45, 9mm, bearing serial number: BTHA785
7. GLOCK, G44, 9mm pistol, bearing serial number: AFFV423
8. CZ, SHADOW 2, 9mm pistol, bearing serial number: F000309
9. HK, VP9L OR, 9mm pistol, bearing serial number: 238-009769
10. HK, P30S, 9mm pistol, bearing serial number: 129-095857
11. HK, VP9 Green, 9mm pistol, bearing serial number: 224-318173
12. HK, VP9 FDE, 9mm pistol, bearing serial number: 224-313606
13. HK, HK45-V1, .45 caliber pistol, bearing serial number: HKU-054116
14. ZEV TECHNOLOGIES, AR15-CE-30, .300 caliber AR pistol, bearing serial number: ZFL05003
15. EWS, E-15, .300 caliber AR pistol, bearing serial number: E15-00059
16. Any ammunition related to this case.

By virtue of the commission of the offenses alleged in this Indictment, any and all interest the defendants have in the above-described property is vested in and forfeited to the United States.

A TRUE BILL

RB
FOREPERSON

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

Matthew T. Johnson
MATTHEW T. JOHNSON
Assistant United States Attorney

Date: May 12, 2021.

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NOTICE OF PENALTY

Counts One and Two

Violation: 18 U.S.C. §§ 371, 922(u), 922(j) & 2

Penalty: Imprisonment of not more than 5 years, a fine not to exceed \$250,000, or both; a term of supervised release of not more than three years.

Special Assessment: \$ 100.00

Count Three

Violation: 18 U.S.C. § 922(j)

Penalty: Imprisonment for a term of not more than ten years and a fine of not more than \$250,000 or both; supervised release of not more than 3 years.

Special Assessment: \$100.00